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From: Seaman, John

Sent: Friday, February 13, 2004 5:36 PM

To: Abeysuriya, Milanga

Subject: Comments - EPA Energy Star for Air Cleaners

Following are our comments regarding Draft 2 of the Energy Star Program for Air Cleaners.

1. Page 7 - Within NOTE at bottom of page, "must perform within 3 percent of the tested" should read, "must perform within -3 percent of tested".

2. Page 8 - Example in bottom of "box" Note, "must test to 2.425 CADR/Watt (3% tolerance)" should read, "must test to 2.425 CADR/Watt (-3% tolerance)".

Regarding the -3% tolerance requirement, this will be a major concern when any follow-up verification test is made. The AHAM Air Cleaner certification program allows a

-10% tolerance for the Dust challenge result. There will also be product-to-product motor performance variation in a production environment. These factors will not provide repeatable Energy Star results to units that may have been acceptable, (meeting the CADR/Watt of ≥ 2.0), initially.

We therefore request you reconsider the -3% tolerance for a retest situation. A greater tolerance is needed. We feel additional testing is required to establish a reasonable number.

Also, it is not clear if the tolerance as stated originally, (3%), is +3% or -3%. We assume the retest requirement will only be -3%. This needs to be clarified, and the -sign used.

thank you for reviewing our comments.

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